

Joseph H. Harrington
Acting United States Attorney
Eastern District of Washington
Stephanie Van Marter
Assistant United States Attorney
Post Office Box 1494
Spokane, WA 99210-1494
Telephone: (509) 353-2767

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

APR 14 2021

SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

JONATHAN SCOTT ARD,
JORDIN LEMUS,
JERROD JUSTIN HALE, and
JASMINE MARIE CAMPBELL (a/k/a
"Lucas")

Defendants.

No. 4:21-CR-6008-SMJ

SUPERSEDING INDICTMENT

Vio: 21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(vi), (viii), 846
Conspiracy to Distribute 400
grams or more of Fentanyl and
50 Grams or more of Actual
(Pure) Methamphetamine
(Count 1)

21 U.S.C. § 841(a)(1),
(b)(1)(B)(vi), 18 U.S.C. § 2
Possession with the Intent to
Distribute 40 Grams or more of
Fentanyl
(Counts 2, 3)

21 U.S.C. § 841(a)(1), (b)(1)(C),
18 U.S.C. § 2
Possession with the Intent to
Distribute Heroin
(Count 4)

21 U.S.C. § 841(a)(1),
(b)(1)(A)(vi), 18 U.S.C. § 2
Possession with the Intent to

Distribute 400 Grams or more of
Fentanyl
(Count 5)

21 U.S.C. § 841(a)(1),
(b)(1)(A)(viii), 18 U.S.C. § 2
Possession with the Intent to
Distribute 50 Grams or more of
Actual (Pure) Methamphetamine
(Count 6)

18 U.S.C. §§ 922(g)(1),
924(a)(2)
Felon in Possession of a Firearm
(Counts 7, 8)

18 U.S.C. § 924(d), 21 U.S.C. §
853, 28 U.S.C. § 2461
Forfeiture Allegations

COUNT 1

Beginning on a date unknown, but by December 2020, and continuing until
on or about April 13, 2021, in the Eastern District of Washington and elsewhere,
the Defendants, JONATHAN SCOTT ARD, JORDIN LEMUS, JERROD JUSTIN
HALE, and JASMINE MARIE CAMPBELL (a/k/a “Lucas”), and other
individuals, both known and unknown to the Grand Jury, did knowingly and
intentionally combine, conspire, confederate and agree together with each other to
commit the following offense: distribution of 50 grams or more of actual (pure)
methamphetamine and 400 grams or more of a mixture or substance containing a
detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide
(a/k/a “Fentanyl”), a Schedule II controlled substance, in violation of 21 U.S.C.
§§ 841(a)(1), (b)(1)(A)(viii) and (vi), 846.

COUNT 2

On or about December 13, 2020, in the Eastern District of Washington, the Defendant, JONATHAN SCOTT ARD, knowingly and intentionally possessed with intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (a/k/a "Fentanyl"), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi), and 18 U.S.C. § 2.

COUNT 3

On or about March 3, 2021, in the Eastern District of Washington, the Defendant, JONATHAN SCOTT ARD, knowingly and intentionally possessed with intent to distribute 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (a/k/a "Fentanyl"), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(vi), and 18 U.S.C. § 2.

COUNT 4

On or about March 3, 2021, in the Eastern District of Washington, the Defendant, JONATHAN SCOTT ARD, knowingly and intentionally possessed with intent to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C) and 18 U.S.C. § 2.

COUNT 5

On or about March 3, 2021, in the Eastern District of Washington, the Defendant, JERROD JUSTIN HALE, knowingly and intentionally possessed with intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (a/k/a "Fentanyl"), a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(vi), and 18 U.S.C. § 2.

COUNT 6

On or about March 3, 2021, in the Eastern District of Washington, the Defendant, JERROD JUSTIN HALE, knowingly and intentionally possessed with intent to distribute 50 grams or more of actual (pure) methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii), and 18 U.S.C. § 2.

COUNT 7

On or about March 3, 2021, in the Eastern District of Washington, the Defendant, JONATHAN SCOTT ARD, knowing of his status as a person previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm in and affecting commerce, to wit: a Springfield XDM .40 caliber pistol, bearing serial number MG141882, which firearm had theretofore been transported in interstate and/or foreign commerce, in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2).

COUNT 8

On or about March 3, 2021, in the Eastern District of Washington, the Defendant, JERROD JUSTIN HALE, knowing of his status as a person previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm in and affecting commerce, to wit: a Ruger LCP .380 caliber pistol, bearing serial number 371903965, which firearm had theretofore been transported in interstate and/or foreign commerce, in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2).

NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

The allegations contained in this Superseding Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures.

Pursuant to 21 U.S.C. § 853, upon conviction of an offense of violation of 21 U.S.C. § 841, as charged in Counts 1 – 6 of this Superseding Indictment, the Defendants, JONATHAN SCOTT ARD (Counts 1 – 4); JORDIN LEMUS (Count 1);

1 JERROD JUSTIN HALE (Counts 1, 5, and 6); and, JASMINE CAMPBELL. (a/k/a
 2 “Lucas”) (Count 1), shall forfeit to the United States of America, any property
 3 constituting, or derived from, any proceeds obtained, directly or indirectly, as the result
 4 of such offense and any property used or intended to be used, in any manner or part, to
 5 commit or to facilitate the commission of the offense. The property to be forfeited
 6 includes, but is not limited to, the following listed assets:

7 Defendant JONATHAN SCOTT ARD:

- 8 - a Springfield XDM .40 caliber pistol, bearing serial number
 9 MG141882 loaded with one round of .40 caliber ammunition; and,
 10 - Any and all seized ammunition and accessories, including:
 11 three (3) .40 caliber rounds of ammunition and a loaded magazine.
 12

13 Defendant JERROD JUSTIN HALE:

- 14 - \$8,942.00 U.S. currency; and,
 15 - a Ruger LCP .380 caliber pistol, bearing serial number 371903965.
 16 - any and all seized ammunition and accessories, including:
 17 Forty-nine (49) .380 rounds with a stamp of *I*;
 18 Forty (40) .380 rounds with a stamp of “Federal Auto”;
 19 Thirty-five (35) .380 rounds with a stamp of “Win Auto”; and,
 20 Twenty-six (26) .380 rounds with a stamp of “ACP Tulammo.
 21 all contained in a black case; and,
 22 Fifteen (15) loose rounds of .380 ammo stamped “Win Auto”; and,
 23 a loaded magazine.
 24

25 If any forfeitable property, as a result of any act or omission of the
 26 Defendants:

- 27 a. cannot be located upon the exercise of due diligence;
 28 b. has been transferred or sold to, or deposited with, a third party;
 c. has been placed beyond the jurisdiction of the court;
 d. has been substantially diminished in value; or

1 e. has been commingled with other property which cannot be divided
 2 without difficulty,
 3 the United States of America shall be entitled to forfeiture of substitute property
 4 pursuant to 21 U.S.C. § 853(p).

5 Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction
 6 of an offense in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2), as set forth in
 7 Counts 7 and 8 of this Superseding Indictment, Defendants, JONATHAN SCOTT
 8 ARD (Count 7) and JERROD JUSTIN HALE (Count 8), shall forfeit to the United
 9 States of America, any firearms and ammunition involved or used in the
 10 commission of the offense, including, but not limited to:

11 Defendant JONATHAN SCOTT ARD:

- 12 - a Springfield XDM .40 caliber pistol, bearing serial number
- 13 MG141882 loaded with one round of .40 caliber ammunition; and,
- 14 - any and all seized ammunition and accessories, including:
- 15 three (3) .40 caliber rounds of ammunition and a loaded magazine.

16 Defendant JERROD JUSTIN HALE:

- 17 - a Ruger LCP .380 caliber pistol, bearing serial number 371903965.
- 18 - a Ruger LCP .380 caliber pistol, bearing serial number 371903965.
- 19 - any and all seized ammunition and accessories, including:
- 20 Forty-nine (49) .380 rounds with a stamp of *I*;
- 21 Forty (40) .380 rounds with a stamp of "Federal Auto";
- 22 Thirty-five (35) .380 rounds with a stamp of "Win Auto"; and,
- 23 Twenty-six (26) .380 rounds with a stamp of "ACP Tulammo.
- 24 all contained in a black case; and,

25 //

26 //

27 //

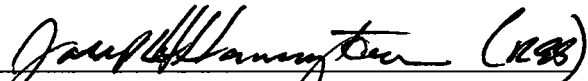
28 //

Fifteen (15) loose rounds of .380 ammo stamped "Win Auto"; and,
a loaded magazine.


DATED this 14 day of April 2021.

A TRUE BILL

Forfeitureperson



Joseph H. Harrington
Acting United States Attorney



Stephanie Van Marter
Assistant United States Attorney